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January 11, 2019

Hon. J. Paul Oetken
United States District Judge
Southern District of New York
40 Foley Square
Courtroom 706
New York, NY 10007

Re: United States v. Lev Parnas, et. al., 19-cr-725 (JPO)

Dear Judge Oetken:

Yesterday evening, the Government produced another tranche of discovery materials, which we picked up this morning.

Given our review of those materials, Mr. Parnas respectfully requests a second modification of the Protective Order governing discovery to allow him to produce the following additional items to the United States House of Representatives' Permanent Select Committee on Intelligence (HPSCI): (1) Image of Samsung phone, stamped USAO_LP_00000020; (2) Image of Apple iPhone Model A1549, stamped USAO_LP_00000032; (3) Image of Apple iPad Model A1397, stamped USAO_00000033.

These materials fall within the scope of HPSCI's September 30, 2019 letter request and October 10, 2019 subpoena, in connection with the presidential impeachment inquiry. Review of these materials is essential to the Committee's ability to corroborate the strength of Mr. Parnas's potential testimony.

The Government does not object to Mr. Parnas producing these materials to HPSCI, subject to receiving approval from the Court.

At present, we do not know whether we intend to produce the entirety of the materials, or a subset filtered for either privilege or relevancy. If a subset, we will inform the Court and Government as to what we have actually have produced.

Thank you for consideration of this application.

Respectfully submitted,

_____/S/_____
Joseph A. Bondy
Counsel to Lev Parnas

c: All Counsel